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20 **UNITED STATES DISTRICT COURT
 21 NORTHERN DISTRICT OF CALIFORNIA**

22 ANIBAL RODRIGUEZ, SAL CATALDO,
 23 JULIAN SANTIAGO, and SUSAN LYNN
 24 HARVEY, individually and on behalf of all
 25 others similarly situated,

26 Plaintiffs,

27 v.

28 GOOGLE LLC,

Defendant.

Case No. 3:20-cv-04688-RS

**PLAINTIFFS' PROPOSED VOIR DIRE
 QUESTIONS**

The Honorable Richard Seeborg
 Courtroom 3 – 17th Floor
 Trial Date: August 18, 2025

1 Pursuant to Honorable Richard Seeborg's Guidelines for Final Pretrial Conference in Civil
 2 Jury Cases, Plaintiffs respectfully submit the following Proposed Oral *Voir Dire* Questions.

3 Plaintiffs understand that the Case Management Order allows for brief follow-up
 4 questioning by counsel following the Court's jury questionnaire and oral *voir dire*. Plaintiffs submit
 5 limited follow-up questions in advance because most of Plaintiffs' *voir dire* will be individual
 6 follow-up questions that will be informed by answers provided by prospective jurors on their jury
 7 questionnaires or orally in court.

8
 9 Dated: July 25, 2025

Respectfully submitted,

10 By: /s/ Mark C. Mao

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23 *Attorneys for Plaintiffs*

PROPOSED ORAL *VOIR DIRE* QUESTIONS

1. To the extent the Court does not include any of Plaintiffs' proposed jury questions in the jury questionnaire, Plaintiffs would ask to include those questions during *voir dire*.
2. Does anyone have a strong preference for using Google products? (If yes, please explain.)
3. Do any of you have any experience working in digital advertising? (If yes, please explain.)